

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

MDL No. 2817

Case No. 18 C 864

Hon. Amy J. St. Eve

This Document Applies to All Actions

**JOINT DECLARATION OF  
CHRISTOPHER J. McDONALD AND MICHAEL ROBERTS  
IN SUPPORT OF THEIR APPLICATION FOR APPOINTMENT AS  
INTERIM CO-LEAD COUNSEL FOR THE CLASS ACTION**

CHRISTOPHER J. McDONALD and MICHAEL ROBERTS, declare as follows:

1. I, Christopher J. McDonald, am a member of the bars of the State of New York, the Southern and Eastern Districts of New York, the Second, Third, Fourth, Ninth, and Federal Circuits, and the United States Supreme Court. I am admitted *pro hac vice* before this court and am attorney of record for Plaintiff Bob Baker Volkswagen. I am a partner with Labaton Sucharow LLP.
2. I, Michael Roberts, am licensed to practice law in the States of Arkansas, Florida, Tennessee, Texas and New York. I am attorney of record for and have filed a notice of appearance on behalf of Plaintiff Hoover Automotive, LLC. I am managing partner at Roberts Law Firm, P.A.
3. We submit this joint declaration in support of the application to appoint Christopher J. McDonald and Labaton Sucharow LLP and Michael Roberts and Roberts Law Firm, P.A. as interim co-lead class counsel pursuant to Rule 23(g) of the Federal Rules of Civil Procedure.

4. Attached hereto as exhibits are true and correct copies of the following documents:

<b>Exhibit No.</b>	<b>Description</b>
Exhibit 1	Labaton Sucharow LLP firm resume
Exhibit 2	Roberts Law Firm, P.A. firm resume
Exhibit 3	Freed Kanner London & Millen LLC firm resume

We each declare, under penalty of perjury, that the foregoing facts are true and correct.

Dated: March 26, 2018

/s/ Christopher J. McDonald  
Christopher J. McDonald

/s/ Michael Roberts  
Michael Roberts